

April 27, 2004

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

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APR 28 2004

Federal Communications Commission
Office of the Secretary

Ms. Stevenson:

Re: Docket 02-386

I am writing this letter in response to the FCC press release requesting comments on whether it should impose mandatory minimum information sharing requirements on all local and long-distance telephone companies. (FCC SEEKS COMMENTS ON IMPOSITION OF MANDATORY MINIMUM INFORMATION SHARING REQUIREMENTS ON TELCOS, Released March 11, 2004)

Transaction Networks, Inc. is a direct billing company that has been active in the telecommunications market for over fourteen years. We currently purchase billing name and address information (BNA) from both Incumbent local exchange companies (ILECs) and Competitive local exchange companies (CLECs). We have agreements to purchase BNA with over 2,000 LECs.

My first comments are in regards to standardizing Customer Account Record Exchange (CARE) information, which includes BNA. CARE data was not exchanged in a uniform manner by all LECs prior to the Telecommunications Act of 1996. This still remains the same today. Normally, the larger local exchange companies (LECs) are able to provide data in a CARE format. But even though they are capable of providing us with BNA in this format, each company has its own specified format needs. Not all of the fields in a each CARE file are populated consistently from one company to another.

On the other hand, the smaller LECs provide BNA in many different ways. We receive everything from a handwritten fax to an Excel spreadsheet. To expect anything else from these exceptionally small companies is not realistic. Many of these smaller LECs cannot afford to spend the time or the money necessary to set up a standard CARE format. I believe that standardizing the CARE format would be beneficial for all parties involved, but I do not believe it is a goal that can be realistically met by the smaller LECs.

My next set of comments are in regards to wireline-to-wireless number portability. Transaction Networks is currently facing a problem that we only see one solution for. The problem is that wireless telecom providers will not provide BNA to long-distance providers for billing purposes. The wireless providers indicate that calls cannot be charged to a wireless number. We find that this is not the case. Currently we have over 78,000 call records that are charged to a known wireless number. In addition to this problem, there are ANIs that were previously land line numbers that are now wireless numbers, which means that they are undetectable under current methods. These are calls that our customers and we are unable to bill for.

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As is pointed out in your press release, wire line-to-wireless number porting will create a huge problem for CARE provisioning. It is essential that the FCC insist that all wireless providers must perform just like any other Local Service Provider. They must be forced to share their BNA information. Otherwise, we will have hundreds of thousands of call records that we will not be able to invoice.

Please feel free to contact me at any time to discuss these issues further.

Sincerely,

Edward "Ted" Finnigan
President
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